

Highly Confidential

Page 1

JEROME CONTAMINE - VOLUME I
UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UMB BANK, N.A., as Trustee,

Plaintiff

vs.

SANOFI,

Defendant

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) No. 15 Civ. 08724 (GBD)

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VOLUME I

HIGHLY CONFIDENTIAL

DEPOSITION OF JEROME CONTAMINE

WEDNESDAY, SEPTEMBER 5, 2018

WEIL, GOTSHAL & MANGES

2 RUE DE LA BAUME

PARIS, FRANCE

Reported by: Sandra A. Deschaine, CSR, RPR,

CLR, CRA

Job No. 146890

1 JEROME CONTAMINE - VOLUME I

2 Q. Correct? That's what this
3 document shows; yes?

4 A. That's what this document shows.

5 Q. And then there's a risk that if
6 you have a slower ramp-up in Europe, in the
7 EU 5, that too will reduce sales against the
8 milestone, correct?

9 A. So, sir, this is correct. This is
10 about forecasting. This is about
11 forecasting. So the question I had is are we
12 going to pay this milestone or not? The
13 answer from the finance team is highly
14 different scenario, and based on this
15 scenario, and they give me some details, on
16 this additional scenario we pay the CVR
17 milestone. It's what he says, unless you are
18 not approved in the U.S., that's it.

19 Q. Do you know what the CVR agreement
20 is?

21 A. I do not know the details.

22 Q. Do you know what the phrase
23 "diligent efforts" means?

24 MR. NEUWIRTH: Are you talking
25 about the phrase "diligent efforts" in